

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SARA S. ECHEVARRIA,)	
)	
Plaintiff,)	C.A. NO. 05-284 GMS
)	
v.)	
)	
U-HAUL INTERNATIONAL, INC.,)	TRIAL BY JURY OF
ROGER MAYFIELD, and)	TWELVE DEMANDED
NATIONWIDE GENERAL INSURANCE)	
COMPANY,)	
)	
Defendants.)	

**DEFENDANT NATIONWIDE GENERAL INSURANCE COMPANY'S
INITIAL DISCLOSURES PURSUANT TO RULE 26(a)(1)**

1. Give the name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying subjects of the information.

ANSWER:

Plaintiff Sara S. Echevarria

Roger Mayfield
Last Known Address
12855 S. Belcher Road
Largo, FL 33773

Delaware State Police

Darlene Wynne
302 Misty Vale Drive
Middletown, DE 19709

Hamid Homeli
124 Walker Way
Newark, DE 19711

Paulette S. Smoak
Address Unknown
(302) 453-8464

Republic Western Insurance
P.O. Box 2789
Warminster, PA 18974-2789

Able Moving Company
12855 S. Belcher Road, #B8
Largo, FL 33773

U-Haul International, Inc.

2. Identify a copy of, or description by category and location of, all documents, data compilations, and tangible things that are in possession, custody, or control of the party that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

ANSWER:

Counsel for defendant is in possession of a copy of State of Delaware Police Accident Report and Medical Records of Dr. Lawrence Chang, Dr. Andrew Barrett, Diagnostic Imaging, Mansoor & Marovati, Dr. Eric Schwartz, American Radiology Services, Pro Physical Therapy, Delaware Neurosurgical Group, Christiana Care Health Systems, Christiana Spine Center, Thomas Harries, M.D. and Carl R. Yacoub, M.D. These documents are available for copying or inspection upon request.

3. Give a computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary materials, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of the injuries suffered.

ANSWER:

This answering defendant's damages will be those determined by a jury with cross claims on co-defendants.

4. Identify for inspection and copying as under Rule 34 any insurance agreement under which any person carrying on any insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy a judgment.

ANSWER:

See attached certified policy.

MORGAN SHELSBY & LEONI

/s/ Robert J. Leoni
ROBERT J. LEONI, I.D. #2888
Rleoni@mslde.com

/s/ Michael J. Logullo
Michael J. Logullo, I.D. #3851
Mlogullo@mslde.com

221 Main Street
Wilmington, DE 19804
(302) 995-6210
Attorney for Defendant, Nationwide

DATE: January 6, 2006

IN THE SUPERIOR COURT OF THE STATE OF DELAWARE
IN AND FOR NEW CASTLE COUNTY

SARA S. ECHEVARRIA,)	
)	
Plaintiff,)	C.A. NO. 05-284 GMS
)	
v.)	
)	
U-HAUL INTERNATIONAL, INC.,)	TRIAL BY JURY OF
ROGER MAYFIELD, and)	TWELVE DEMANDED
NATIONWIDE GENERAL INSURANCE)	
COMPANY,)	
)	
Defendants.)	

NOTICE OF SERVICE

I HEREBY CERTIFY on this 6th day of January 2006, two copies of the foregoing Defendant, Nationwide General Insurance Company's Initial Disclosures Pursuant to Rule 26 (a) (1) was sent via first-class, postage prepaid mail to:

Richard A. DiLiberto, Jr., Esquire
YOUNG CONAWAY STARGATT & TAYLOR, LLP
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, DE 19801

Steven L. Caponi, Esquire
BLANK ROME, LLP
1201 Market Street, Suite 800
Wilmington, DE 19801

MORGAN SHELSBY & LEONI

/s/ Robert J. Leoni
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/s/ Michael J. Logullo
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